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OGC 79-07081 1 August 1979

MEMORANDUM FOR: Chief, Regulations Control Division, ISS

FROM:

Office of General Counsel

SUBJECT:

Proposed Employee Bulletin on Van Pooling

- 1. This memorandum is in response to your request for comment from this Office on a proposed employee bulletin on the subject of van pooling. Although this Office has no objection to the publication of a bulletin of this sort, we believe that the draft presented for our review fails to address certain key points: first, until there is a major reversal of Government policy on home-to-work transportation the Agency cannot offer substantial aid to a van pooling program in terms of funding and management support; and second, significant problems have yet to be resolved in the areas of cover, and state and federal regulation and taxation.
- 2. Given these concerns it may be advisable to recast the bulletin as a survey of interest issued prior to commencing significant effort on the project. In that regard, I have attached a copy of a draft for consideration by the Office of Logistics.

Attachment

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